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Attorney for Debtor(s)

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA

In re:

GEORGE MKITARIAN

Debtor

Chapter 13

Case No. 2:22-bk-15448-VZ

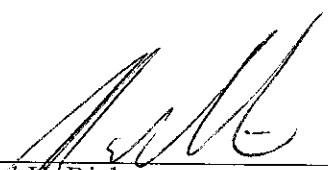
DECLARATION OF GEORGE
MKITARIAN, IN SUPPORT OF
OPPOSITION TO TRUSTEE'S MOTION
TO DISMISS CASE;

DATE: 5/08/2023
TIME: 11:30 AM
COURTROOM: 1368
PLACE: 255 E. Temple Street
Los Angeles, CA 90017
Courtroom 1368 13th Floor

**TO THE HONORABLE VINCENT P. ZURZOLO, UNITED STATES
BANKRUPTCY JUDGE; CHAPTER 13 TRUSTEE;**

George Mkitarian, debtor in case number 2:22-bk-15448-VZ, hereby submits the
attached declaration in support of Debtor's Opposition to Trustee's Motion to Dismiss Case.

Dated: May 2, 2023


Axel H. Richter
Law Offices of Axel H. Richter

DECLARATION OF GEORGE MKITARIAN

1. George Mkitarian, declare and state as follows:

1. I am over the age of eighteen years and I am the debtor in case number 2:22-bk-15448-VZ. I have personal knowledge of the facts contained herein and could and would competently testify thereto if called as witnesses.

2. Since I had filed an opposition the trustee's motion to dismiss my case I was hoping I could timely address the trustee's objection to confirmation of my proposed plan, however, my wife had been diagnosed with advanced cancer and was hospitalized in December 2022. Unfortunately, my wife was totally incapacitated until April 4, 2023 and needed help with all of her affairs, which included to take care of her Airbnb short term renters, which occupied part of her property. I took care of all of her affairs, even though we are in a divorce proceeding.

3. When my wife was released from the hospital she had to be moved to an all care facility since she is not able to take care of herself. I still had to take her of her affairs which required tasks that didn't allow me to take care of my own duties and affairs, as a result thereof I neglected my duties with respect to my bankruptcy case. Although, I am currently in the process to have my tax returns prepared and filed, my tax preparer advised me that he could not complete my tax returns until late in May, 2023 due to his work schedule during the current tax season.

4. In addition, my financial circumstances were impaired due to expenses I had incurred, while I was taking care of my wife's affairs, as a result thereof I was not able to make all of my required plan and mortgage payments.

5. I understand that my case will be dismissed due to missed plan payments and failure to address the trustee's objections. I hope that I will be allowed to refile my case so that I am able to address all issues to propose a feasible chapter 13 plan.

I declare under the penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed on this 2nd day of May, 2023 at Culver City, California.


George Mkitarian

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

11949 West Jefferson Blvd., Suite 107, Culver City, CA 90230

A true and correct copy of the foregoing document entitled (*specify*):

A true and correct copy of the foregoing document described as **DECLARATION OF GEORGE MKITARIAN IN SUPPORT OF OPPOSITION TO TRUSTEE'S MOTION TO DISMISS CASE;**

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 5/02/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Nancy Curry, CHAPTER 13 TRUSTEE, TrusteeECFMail@gmail.com
Dane W Exnowski, Dane.exnowski@mcalla.com, bk.ca@mcalla.com, mccallarcf@ecf.courtdrive.com
Nichole Glwin, bankruptcy@zbslaw.com, nglwin@ecf.courtdrive.com
United States Trustee, ustpreion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:**

On (date) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

5/02/2023

Date

Axel Richter

Printed Name

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.